

TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 95OPDE113
to be issued to:

Brite-Line Technologies, LLC
Denver County
Source ID 0311526

Prepared by Geoffrey Drissel
June 20, 2008

I. Purpose:

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued April 1, 1998. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted September 28, 2007. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Source Description:

This source is classified as a manufacturer of highway marking products which falls into the Standard Industrial Classification 3069 for fabricated rubber products. Processes include a tape coating line, thermo plastic batch mixing and bagging line,

and testing equipment. The tape in the coating line is painted, covered with glass beads, oven dried, coated with glue and a release agent, oven dried again, rewound and slit to size. The mixing/bagging line mixes various dry resins and produces 50 pound bags of product.

The facility is located in northeast Denver, which is part of the Denver Metro Area. The Denver Metro Area is classified as attainment/maintenance for particulate matter less than 10 microns in diameter (PM₁₀) and carbon monoxide (CO). Under that classification, all SIP-approved requirements for PM₁₀ and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act. The Denver Metro Area is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.16.

This facility is located within 100 km of a Class I area, Rocky Mountain National Park but there are no other states within 50 miles. The applicant certified that they are not a 112(r) source and are considered a minor source for New Source Review.

Based on the information provided by this source, Brite Line is a major source of HAPs (i.e. facility-wide potential to emit of greater than 10 tons per year of any single HAP or greater than 25 tons per year of all HAPs combined). As such, the facility is subject to the National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coatings, 40 CFR Part 63, Subpart JJJJ. Brite-Line is required to meet HAP emissions standards and demonstrate compliance with emission limitations in accordance with this subpart.

Facility wide emissions for this source are as follows:

<u>Pollutant</u>	<u>Potential to Emit (TPY)</u>	<u>Actual Emissions (TPY)</u>
VOC	34.6	12.6
PM	0.102	1.49X10 ⁻⁴
PM ₁₀	0.097	1.43X10 ⁻⁴
HAPs	34.6	5.3

(Note: the HAPs consist mostly of Toluene)

Potential emissions for VOC and PM₁₀ are as limited in the current Operating Permit, HAPs emissions are as calculated in the Title V application. Actual emissions estimates are based on APEN data submitted with the renewal application.

III. Discussion of Modifications Made:

Source Requested Modifications

The source requested the following changes to the permit in their renewal

application:

Page following Cover Page

Revise the company name to Brite-Line Technologies, LLC

Change the Facility Contact Person

Other Modifications

In addition to the requested changes, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Shafer Operating Permit:

Section I

Condition 1.1 was revised to reflect the non-attainment status for the area.

Condition 1.4 was revised to reflect the most recent references.

Condition 3 as revised to reflect the most current language regarding the PSD status of the source.

Section III – Permit Shield

The shield citation was updated to reflect the most current reference.

Section IV – General Conditions

The General Conditions section was replaced with the most current version.

Appendices

Appendices B and C were replaced with the most current versions.

The EPA addresses in Appendix D were updated.